WASHINGTON STATE DEPARTMENT OF ECOLOGY

STATEMENT OF BASIS
PERMIT ST-6162
FACILITY NAME: IMAT, Inc.

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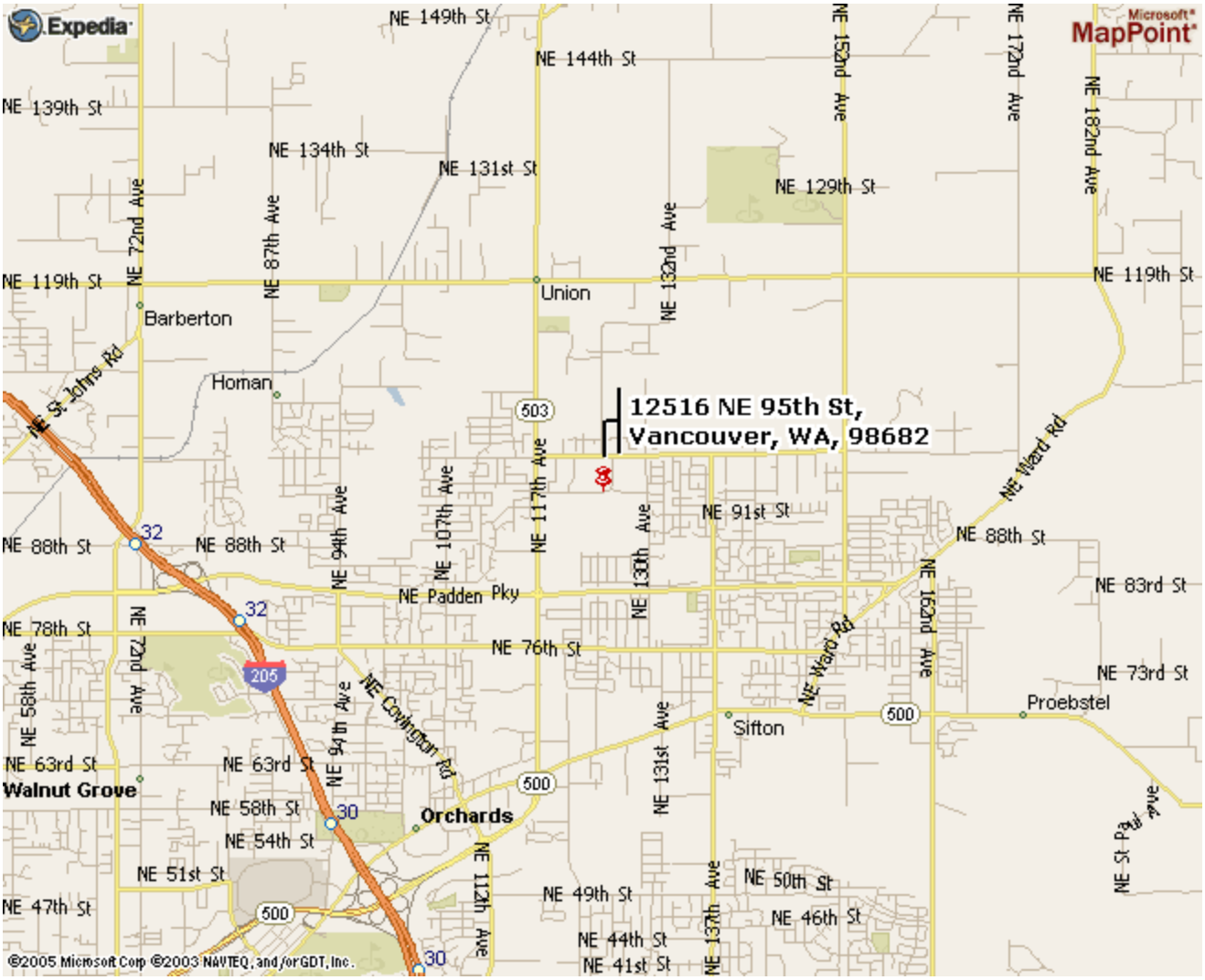
General Information

Facility Name and Address	IMAT, Inc. 12516 NE 95th Street, Suite D110 Vancouver, Washington 98682
Type of Facility	Semiconductors and Related Devices
Standard Industrial Classification (SIC) Code	3674
Facility Discharge Location	This facility discharges to the Clark County/Salmon Creek Publicly Owned Treatment Works (the POTW). IMAT is connected to the sewage collection system of the POTW. The sewage collection system is under the jurisdiction of, and operated by, the Hazel Dell Sewer District (HDSD). The POTW is operated by Clark County. The sewer

	connection for IMAT is located at: Latitude: 45° 41' 24" N Longitude: 122° 32' 45" W The POTW is located in the southwest corner of the state of Washington, just north of Vancouver. The POTW is an activated sludge plant. The final effluent is discharged to the Columbia River in accordance with National Pollutant Discharge Elimination System (NPDES) Permit No. WA0023639. The discharge location for the final effluent is at: Latitude: 45° 44' 27" N Longitude: 122° 45' 25" W
Contact at Facility:	Name: Tatsuo Nakato, President Telephone #: (360) 256-5600
Responsible Official:	Name: Tatsua Nakato Title: President Address: 12516 NE 95th Street, Suite D110 Vancouver, WA 98682 Telephone #: (360) 256-5600 FAX #: (360) 256-7766

IMAT Vicinity Map



Permit Status

On December 16, 2003, IMAT Inc. (IMAT) submitted a renewal application for a State Waste Discharge permit to the Department of Ecology (Department). The Department did not act on that application within 60 days. Under the provisions of Chapter 90.48.200 of the Revised Code of Washington (RCW), IMAT was granted a Temporary State Waste Discharge Permit (TSWDP) No. ST-6162 effective February 14, 2004. Under the TSWDP, IMAT was permitted to discharge waste water from IMAT and Isonics operations into the Hazel Dale Sewer District (HDSD) sanitary sewer system at a flow rate of 1,800 gallons per day (gpd) monthly average and 6,000 gpd daily maximum. Further, IMAT had to comply with all requirements and limitations listed in the previous permit, issued October 8, 2002.

On April 6, 2004, IMAT requested to increase the 1,800-gpd monthly average flow rate to 3,600 gpd. The Department did not act on that request within 60 days. Under the provisions of Chapter 90.48.200 of the Revised Code of Washington (RCW), IMAT received a new TSWDP effective June 6, 2004. Under the

TSWDP, IMAT is permitted to discharge waste water from IMAT and Isonics operations into the HDSD sanitary sewer system at a flow rate of 3,600 gpd monthly average and 6,000 gpd daily maximum. Further, IMAT must comply with all requirements and limitations listed in the permit, issued October 8, 2002. The TSWDP will remain in effect until it is modified as proposed in this Statement of Basis.

Findings

1. Isonics moved its operations to another location; therefore the December 16, 2003, application is not applicable any more.

2. IMAT requested that the temporary permit flow limits of 3,600 gpd monthly average and 6,000 gpd daily maximum would stay in effect in the future permit.

3. IMAT installed a flow meter on a discharge from the acid waste neutralization (AWN) system. The flow meter was not calibrated yet. The permit requires the following:

   > *The (flow measuring) devices shall be installed, calibrated, and maintained to ensure that the accuracy of the measurements is consistent with the accepted industry standard for that type of device. Frequency of calibration shall be in conformance with manufacturer's recommendations and at a minimum frequency of at least one calibration per year. Calibration records shall be maintained for at least three years.*

4. Water rejected during production of deionized (DI) water goes through the AWN.

5. IMAT took over Silicon Evolutions Inc. (SEI) operations of cleaning silicon wafers. The silicon wafers are not chemically and mechanically grind and/or polished any more at the previous SEI location.

Recommendation for Permit Modification

Based of the above findings the Department proposes that the permit, issued October 8, 2002, be modified as follows:

1. Flow limits are modified to

   a. 3,600 gpd monthly average (Special Condition S1. Discharge Limitations), and

   b. 6,000 gpd daily maximum (Special Condition S1. Discharge Limitations).

2. The requirement to monitor the flow of deionized (DI) water makeup product stream is removed from the permit (Special Condition S2. Monitoring Requirements).

3. The requirement to monitor the flow through the acid waste neutralization (AWN) system is modified as follows (Special Condition S2. Monitoring Requirements):

   a. Sampling frequency is modified from 'monthly' to 'continuous', and

b. Sample type is modified from ‘estimated’ to ‘metered’.

Flow Meter Location